

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
: Plaintiff, :
v. : : Criminal Action No. 07-29-GMS
: :
KELIN BRADLEY, :
: Defendant. :
:

MOTION TO CONTINUE SENTENCING HEARING

Christopher S. Koyste, on behalf of Kelin Bradley, hereby moves this Honorable Court to reschedule the date for Mr. Bradley's Sentencing Hearing from December 19, 2007 at 2:00 p.m. to a date approximately 45 days in the future.

1. The parties are attempting to resolve issues concerning potential relevant conduct that could affect Mr. Bradley's guideline calculations. Counsel spoke to AUSA Robert F. Kravetz and USPO Martin P. Durkin and they are in agreement with Mr. Bradley's request to continue his Sentencing Hearing.
2. Counsel asserts that such a continuance is in the interest of justice as it will allow the parties to fully and properly address all sentencing issues in this case.

WHEREFORE, Mr. Bradley respectfully requests Your Honor to reschedule his Sentencing Hearing to a date 45 days in the future.

Respectfully submitted,

/s/ Christopher S. Koyste

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DATED: December 4, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
: Plaintiff, :
v. : : Criminal Action No. 07-29-GMS
: Defendant. :
KELIN BRADLEY, :

CERTIFICATE OF SERVICE

Undersigned Counsel certifies that the attached filing of Kelin Bradley is available for public viewing and downloading and was electronically delivered on December 4, 2007 to:

Robert F. Kravetz, Esquire
Assistant United States Attorney
United States Attorney's Office
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/s/ Christopher S. Koyste
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Attorney for Kelin Bradley

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ORDER

Having considered Defendant's Motion to Continue the Sentencing Hearing:

IT IS HEREBY ORDERED this _____ day of December, 2007, that Defendant's
Sentencing Hearing is continued to _____.

Chief Judge Gregory M. Sleet
United States District Court Judge